



# Clayton Chemical Co.

*Sauget, Illinois*  
*4/1/89* 144886

March 22, 1990

Paul Takacs  
Illinois EPA  
2200 Churchill Rd  
P.O. Box 19276  
Springfield, IL 62794-9276

Dear Mr. Takacs,

Pursuant to your request at our meeting on January 3, 1990, the following information is submitted in an effort to delist Clayton Chemical Company from Area II of the Sauget Sites.

The description of activities that took place at Clayton Chemical include primarily oil and solvent processing. Clayton Chemical was started in 1962 as a crude oil topping plant producing such products as white gas and distillate fuel oils. In the mid '60s crude oil topping ceased and solvent reclamation began. The primary means of reclaiming solvent during that time was the use of steam injected pot stills. In 1980 a thin film evaporator was installed and used as the primary solvent reclamation unit at the facility. Also in 1980, Trade Waste Incineration began operating a hazardous waste incinerator on the property and continued this activity until 1983 when they relocated.

Up until 1980, the only use of the existing sewer line was to discharge non-contact cooling water and domestic sewage. Additional sewer lines were installed in 1980 as part of plant expansion projects. We are still attempting to obtain records pertaining to Clayton Chemical's sewer discharge during the period of time that the Sauget lagoons were in operation. As this information becomes available, we will forward it along to you.

There are three wells existing on Clayton Chemical's property only one of which is operational, however not in use. Two wells were drilled in 1976, the first of which was 80 feet deep and immediately abandoned due to casing problems. The second of the two wells was 78 feet deep and was used until it was discontinued in 1983 and replaced with a 90 foot well that is still operational today.

In the early eighties, plans for expansion of the facility and implementation of various federal regulations prompted Clayton Chemical to purchase three different parcels of land from Gulf, Mobile and Ohio Railroad and the Village of Sauget. Prior to 1980, Clayton Chemical leased that property owned by G.M&O Railroad.

You had also requested information regarding contamination on site at the facility. Information pertaining to any on site contamination has been submitted as part of Clayton Chemical's RCRA Part B permit application originally submitted on November 2, 1989 with

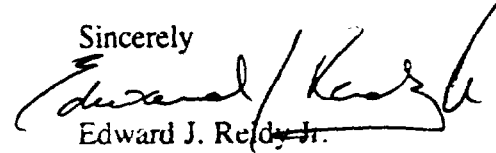
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additional information submitted on January 16, 1990.

We would like to reiterate our position that IEPA proceed to delist Clayton Chemical Company from Area II. Since EPA has in effect policy to defer listing sites that can be addressed by RCRA corrective action and that Clayton Chemical has plans to continue efforts to obtain a RCRA Part B permit and address whatever corrective action that may be necessary, delisting or physically removing Clayton Chemical Co. from Area II seems quite logical. Some of our discussions with other parties involved in Area II have indicated a preference by those other involved parties to exclude Clayton Chemical's Property from the sites in Area II.

If you have any questions or comments regarding this matter, please feel free to contact me at (618) 271-0467.

Sincerely



Edward J. Reidy, Jr.

cc: James Morgan  
Dale Guariglia

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